

**REMARKS**

Claims 2-9, 11-14, 16-20 and 22 are all the claims presently pending in this application, all of which are rejected. Claims 1 and 21 were previously cancelled. The recitations of dependent claim 10 are hereby incorporated into independent claim 2, and claim 10 is thus also cancelled.

Claims 2-6, 10-13, 16-19 and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sato (JP 11-78411) and further in view of Sato (JP 11-78410, Sinopoli (U.S. Patent No. 5,743,975) and Koch (U.S. Patent No. 6,012,498). Applicants respectfully traverse this rejection in view of the following remarks.

In Sato (JP 11-78411), which is the primary reference of the aforementioned 35 U.S.C. §103 (a) rejection against claim 2, there is described no feature corresponding to the formula " $0.25 \text{ mm} \leq \delta G \leq 1.00 \text{ mm} \text{ --- (3)}$ " of former claim 10. Further, Sato (JP 11-78410), which is one of the secondary references and discloses the feature of intervals between the metal cords of Sato (JP 11-78411) in detail, similarly discloses no such feature.

In fact, in all of examples 1, 2 and comparative examples 1-10 described in Sato (JP 11 78410), at least one of the respective cord intervals (D1; D2) of the two belt layers (31, 32) is outside the aforementioned specific range of " $0.25 \text{ mm} \leq \delta G \leq 1.00 \text{ mm}$ " of the present invention.

Specifically, in example 1 of Sato (JP 11-78410), D1 is 1.03 mm and D2 is 0.72 mm. Therefore, although D2 is within the aforementioned range of " $0.25 \text{ mm} \leq \delta G \leq 1.00 \text{ mm}$ ," D1 is outside the range. In example 2, in which D1 is 1.20 mm and D2 is 0.72 mm, D1 is outside the range. Both D1 and D2 are very small in comparative example 1, while both D1 and D2 are very large in comparative examples 2, 4, 7 and 9, whereby both D1 and D2 are outside the range in these comparative examples. In the remaining comparative examples 3, 5, 6, 8 and 10, *one of* D1 and D2 is outside the range.

In contrast, in the present specification, there is clearly stated in the second full paragraph of page 14 thereof that the interval (50) between the metal wire bundles in each of the two belt plies should satisfy the formula (3), i.e.,  $0.25 \text{ mm} \leq \delta G \leq 1.00 \text{ mm}$ . The  $\delta G$  range has thus been specified in the present invention, on the basis of the discovery that, "When  $\delta G$  is less than 0.25 mm, the generation and growth of belt end portion separation cannot be

suppressed. When  $\delta G$  exceeds 1.00 mm, due to the interval between the metal wire bundles becoming too large, the belt rigidity decreases, and the penetration resistance when the tire rides over nails or the like is poor” (the last line of page 14 to line 5 of page 15 of the present specification).

In short:

- even in Sato (JP 11-78410), which appears to be the closest reference to the present invention, all of the specific  $\delta G$  values of examples and comparative examples thereof are completely outside the specific  $\delta G$  range defined by present claim 2;
- none of other cited references (such as Sinopoli, etc.) discloses the specific  $\delta G$  range defined by present claim 2;
- therefore, no combination of the cited references would have reached the structure defined by present claim 2;
- the structure defined by amended claim 2 exhibits, as indicated by the paragraph bridging pages 14 and 15 of the present specification, excellent separation-preventing properties and penetration resistance, as compared with the structures of the cited references which do not satisfy the specific  $\delta G$  range of “ $0.25 \text{ mm} \leq \delta G \leq 1.00 \text{ mm}$ ,” and
- therefore, the present invention has sufficient inventiveness over the cited references, and the 35 U.S.C. §103 (a) rejection should be removed.

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- therefore, the present invention has sufficient inventiveness over the cited references, and the 35 U.S.C. §103 (a) rejection should be removed.

In view of the preceding amendments and remarks, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue that the Examiner feels may be best resolved through a personal or telephonic interview, he is kindly requested to contact the undersigned attorney at the local telephone number listed below.

The USPTO is directed and authorized to charge all required fees (except the Issue/Publication Fees) to our Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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